EXHIBIT 1

IN THE DISTRICT COURT OF CUSTER COUNTY
STATE OF OKLAHOMA

DEIRDRE L. STEPHENSON,   )
)
      Plaintiff,   )
)
v.   )   Case No. CJ-2021- *20*
)
LADEAN G. HOFFMAN, individually, and   )
VALLEY PROTEINS, INC., a foreign for-   )
profit business corporation,   )
)
      Defendants.   )

PETITION

COMES NOW, Plaintiff, Deirdre L. Stephenson, and for her cause of action against Defendants, LaDean G. Hoffman, individually and Valley Proteins, alleges and states as follows:

1.   On or about August 5, 2019, near eastbound Interstate 40 and the 60-mile marker, Defendant Hoffman was reckless, grossly negligent, negligent, and negligent in the operation of a motor vehicle while in the course and scope of employment and/or agency and/or joint mission for Defendant Valley Proteins Inc., and, as a result, caused personal injuries to Plaintiff.
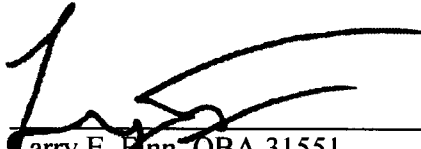
2.   Defendant Valley Proteins Inc. is vicariously liable for damages caused by Defendant Hoffman. Defendant Valley Proteins Inc. is also liable for its negligent entrustment of its vehicle to Defendant Hoffman, for its negligent hiring of Defendant Hoffman, and for negligently retaining Defendant Hoffman.

3.   As a direct result of said negligence, Plaintiff sustained personal injuries resulting in the following elements of damage: both past and future pain and suffering, disability, medical expenses, both past and future loss of income, and loss of quality and enjoyment of life.

WHEREFORE, Plaintiff demands judgment against Defendants in excess of the amount required for diversity jurisdiction pursuant to Section 1332 of Title 28 of the United States Code

and for any and all further relief that Plaintiff may be entitled in law and equity, including punitive damages as appropriate.

Respectfully Submitted,

ATTORNEY'S LIEN CLAIMED
JURY TRIAL DEMANDED

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